

### **REMARKS**

The Examiner is thanked for the performance of a thorough search.

Claim 1 has been amended. No claims have been canceled or added. Hence, Claims 1, 4-12, 17, 20-28, and 33-40 are pending in the present application.

Each issue raised in the Office Action mailed February 18, 2009 is addressed hereinafter.

#### **I. SUMMARY OF TELEPHONE INTERVIEW**

The Examiner is thanked for granting the courtesy of a telephone interview on May 21, 2009. Examiner Patel and Applicant's representatives Brian D. Hickman and Stoycho D. Draganoff attended the interview. Claim 1 and proposed amendments thereof were discussed. The references discussed were Chau et al., U.S. Patent No. 6,643,633 ("CHAU") and Vedula et al., U.S. Patent No. 6,823,495 ("VEDULA"). An agreement regarding patentability was not reached.

The Examiner indicated that the proposed amendments to Claim 1 overcome CHAU and VEDULA. The Examiner also indicated that in light of these amendments a new search or consideration may be required. The proposed amendments to Claim 1 have been officially submitted in the present communication.

With respect to paragraph [0046] of the specification, the Examiner inquired how the features of Claim 1 differ from a transformation that is hardcoded. The Applicant's representatives explained that the fact that the single transformation featured in Claim 1 is not hardcoded allows a user to specify one or more data-converting routines in the dynamically-generated mapping scheme that is used to perform the single transformation. (It is noted that for a transformation that is hardcoded, all data-converting and other routines are compiled into executable form and included into the executable code of the transformation by a software developer that writes the code of the transformation.)

## II. ISSUES RELATING TO THE PRIOR ART

### A. INDEPENDENT CLAIM 1

Claim 1 was rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over Vedula et al., U.S. Patent No. 6,823,495 (“VEDULA”) in view of Chau et al., U.S. Patent No. 6,643,633 (“CHAU”).

Claim 1 comprises the feature of:

...;  
using said mapping scheme to perform a single transformation that moves said XML document directly into said relational database: (a) without materializing the entire XML document separate from said XML document and said relational database during said transformation, and (b) without creating and storing any representation of said XML document separate from said XML document and said relational database during said transformation;

...

It is respectfully submitted that the above feature of Claim 1 is not described or suggested by VEDULA and CHAU.

On page 8, numbered paragraph 6, the Office Action indicated that the feature of Claim 1 highlighted below:

using said mapping scheme to perform a single transformation that moves said XML document directly into said relational database: (a) **without materializing the entire XML document** separate from said XML document and said relational database **during said transformation...**

overcomes CHAU, and that the existence of the this feature in the previous version of Claim 1 was the reason why CHAU ceased to be used as a reference against Claim 1. By the present amendment, this feature has been re-introduced into Claim 1. Thus, it is respectfully submitted that as amended herein Claim 1 includes at least one feature that is not described in CHAU. Further, VEDULA does not describe or suggest this feature of Claim 1 either (and the Office Action does not even assert that it does). Thus, for at least this reason Claim 1 overcomes the rejection over CHAU and VEDULA.

Further, it is respectfully noted that CHAU does not describe or suggest the feature of Claim 1 of:

using said mapping scheme to perform a single transformation that moves said XML document directly into said relational database: ... (b) **without creating and storing any representation of said XML document separate from said XML document and said relational database during said transformation.**

Specifically, at least in the Abstract and in col. 77, lines 30-36 and 51-53, CHAU describes that a **DOM tree** of an XML document is **generated** prior to storing the XML document into a database. However, the generated DOM tree is in fact a representation of the XML document that is separate from the XML document and from the database. Thus, CHAU does not describe the above feature of Claim 1, which indicates the performance of a single transformation that moves an XML document directly into a relational database **without creating and storing any representation** of the XML document that is separate from the XML document and the relational database during said transformation.

For the foregoing reasons, VEDULA and CHAU whether taken alone or in combination do not describe or suggest all features of Claim 1. Thus, Claim 1 is patentable under 35 U.S.C. § 103(a) over VEDULA in view of CHAU. Reconsideration and withdrawal of the rejection of Claim 1 is respectfully requested.

B. DEPENDENT CLAIMS 4-12, 17, 20-28, AND 33-40

Claims 4-12, 17, 20-28, and 33-40 were rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over VEDULA in view of CHAU.

Each of Claims 4-12, 17, 20-28, and 33-40 depends directly or indirectly from independent Claim 1, and therefore includes each and every feature of the independent base claim. Thus, each of Claims 4-12, 17, 20-28, and 33-40 is allowable for the reasons given above for Claim 1. In addition, each of Claims 4-12, 17, 20-28, and 33-40 introduces one or more additional features that independently render it patentable.

For example, Claim 39 comprises the features of:

wherein using said mapping scheme to perform said **single transformation** comprises: processing a first XML element of said XML document to move said first XML element from said XML document to said relational database; and **after processing of said first XML element is completed**, processing a second XML element of said XML document to move said second XML element from said XML document to said relational database, wherein said second XML element is different from said first XML element.

These features of Claim 39 indicate that the single transformation featured in Claim 1 is performed by: processing a first XML element of the XML document to move said first XML element from said XML document into said relational database; and after processing of said first XML element is completed, processing a second XML element of said XML document to move said second XML element from said XML document to said relational database, wherein said second XML element is different from said first XML element.

The Office Action asserts that these features of Claim 39 are described in VEDULA. This assertion is not correct. VEDULA expressly describes transformations that are performed by using XSLT style sheets. (See VEDULA, Fig. 2 and col. 9, lines 42-54). However, performing XSLT transformations requires that the entire source data being transformed must be in an XML format before an XSLT style sheet is applied, and that the XSLT transformations return as output the entire transformed data in XML format. Thus, in contrast to the above features of Claim 39, the transformations in VEDULA involve multiple data transformation steps, according to which all XML elements in a source XML document are first processed by applying XSLT transformations, and only thereafter each of the transformed XML elements are stored in a target XML document.

For the foregoing reasons, it is respectfully submitted that Claims 4-12, 17, 20-28, and 33-40 are allowable for at least the reasons given above with respect to Claim 1.

Reconsideration and withdrawal of the rejections of 4-12, 17, 20-28, and 33-40 is respectfully requested.

## II. CONCLUSION

The Applicant believes that all issues raised in the Office Action have been addressed. Further, for the reasons set forth above, the Applicant respectfully submits that allowance of the pending claims is appropriate. Reconsideration of the present application is respectfully requested in light of the amendments and remarks herein.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a law firm's check for the petition for extension of time fee is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,  
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